

## **EXHIBIT 6**

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA E-MAIL

January 22, 2016

Robert K. Kry, Esq.  
MoloLamken LLP  
600 New Hampshire Ave., N.W.  
Washington, D.C. 20037

Martin F. McMahon, Esq.  
Martin McMahon & Associates  
1150 Connecticut Ave., N.W., Suite 900  
Washington, D.C. 20036

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Robert and Martin:

During the telephonic meet-and-confer on January 15, 2016, we inquired as to whether Dallah Avco had provided any records to its Saudi employment law expert that had not been provided to plaintiffs. At that time, you advised that a limited number of additional documents had been provided to Dallah Avco's expert, and later that afternoon you produced those records at Bates range DA002309-2331.

In reviewing this supplemental production, we noted that the records relate entirely to recruitment activities concerning applicants and employees other than Omar al Bayoumi. Given that these materials were provided to Dallah Avco's expert for purposes of his/her analysis, it follows that Dallah Avco deems these records relevant to the issues currently pending before the Court, and in particular the defenses Dallah Avco intends to raise.

Dallah Avco's position that documents unrelated to Omar al Bayoumi are relevant to Dallah Avco's defenses stands in stark contrast to its position with respect to its obligations in responding to plaintiffs' discovery. In that latter context, Dallah Avco has insisted that plaintiffs are entitled to discovery only of records relating directly to Omar al Bayoumi, and refused to produce documents relating to any other areas of inquiry, urging that such records are categorically irrelevant. Plaintiffs have repeatedly advised Dallah Avco that this interpretation of the Second Circuit's decision is incorrect, and that other categories of records are relevant to the jurisdictional inquiry presently before the Court.

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We simply cannot reconcile Dallah Avco's position with respect to the documents it deems relevant for purposes of advancing its own defenses with the contrary position it has embraced in refusing to respond to plaintiffs' jurisdictional discovery requests.

Obviously, we were not aware of this divergence at any time prior to the meet-and-confer on January 15, 2016. We believe this issue warrants a further discussion, and would ask that you provide dates on which you will be available during the next two weeks. We will follow separately next week with other issues discussed during the meet-and-confer.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean P. Carter", with a long horizontal flourish extending to the right.

Sean P. Carter, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

SPC/bdw

cc: James Kreindler, Esq.  
Andrew Maloney, Esq.  
Jerry Goldman, Esq.  
Bruce Strong, Esq.  
Robert Haefele, Esq.  
J. Scott Tarbutton, Esq.